

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KEY CORPORATE CAPITAL, INC.,

Plaintiff,

-v.-

BNP PARIBAS S.A.,

Defendant.

08-CV-03695 (RJH)

**NOTICE OF MOTION TO  
ADMIT COUNSEL  
PRO HAC VICE**

MAY 28 2008

2008 MAY 28 PM 3:07

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PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Jerrold F. Goldberg, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: CARAN ROTHCHILD

Firm Name: Greenberg Traurig, P.A.

Address: 401 East Las Olas Boulevard  
Suite 2000

City/State/Zip: Fort Lauderdale, FL 33301

Phone Number: (954) 765-0500

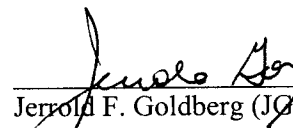
Fax Number: (954) 765-1477

Caran Rothchild is a member in good standing of the Bar of the State of Florida.

There are no pending disciplinary proceedings against Caran Rothchild in any State or Federal court.

Dated: New York, New York  
May 27, 2008

Respectfully submitted,

  
Jerrold F. Goldberg (JG-7471)  
GREENBERG TRAURIG, LLP  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 801-9209  
Facsimile: (212) 801-6400  
kirshenbergr@gtlaw.com

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
KEY CORPORATE CAPITAL, INC.,

Plaintiff,

-v.-

BNP PARIBAS S.A.,

Defendant.  
-----X

08-CV-03695 (RJH)

**AFFIDAVIT OF JERROLD F.  
GOLDBERG IN SUPPORT OF  
MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

State of New York )

) ss:

County of New York )

Jerrold F. Goldberg, being duly sworn, hereby deposes and says as follows:

1. I am a shareholder with Greenberg Traurig, LLP, counsel for Defendant BNP Paribas S.A., ("BNPP") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of BNPP's motion to admit Caran Rothchild as counsel pro hac vice to represent it in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in August 1980. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known of Caran Rothchild since 2001.
4. Ms. Rothchild is a shareholder with Greenberg Traurig, P.A., in Fort Lauderdale, Florida.
5. Ms. Rothchild is a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Caran Rothchild, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Caran Rothchild, pro hac vice, which is attached hereto as Exhibit A.

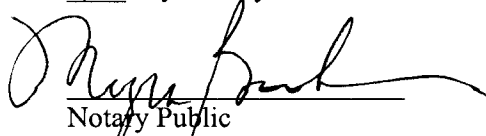
WHEREFORE it is respectfully requested that the motion to admit Caran Rothchild, pro hac vice, to represent Defendant in the above-captioned matter, be granted.

Dated: May 28, 2008

City, State: New York, New York

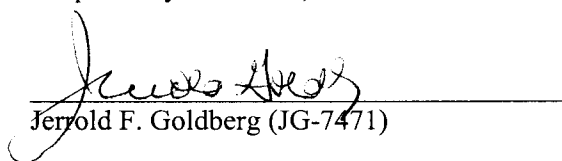
Sworn to before me this

28 day of May 2008

  
Notary Public

MYRA BACHMANN  
NOTARY PUBLIC, State of New York  
No. 03-4700387  
Qualified in Bronx County  
Commission Expires August 31, 2009

Respectfully submitted,

  
Jerrold F. Goldberg (JG-7471)



# The Florida Bar

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET  
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600  
WWW.FLORIDABAR.ORG

State of Florida )

County of Leon )

In Re: 983535  
Caran Louise Rothchild  
Greenburg Traurig P.A.  
401 E. Las Olas Blvd., Ste. 2000  
Ft. Lauderdale, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on September 29, 1993.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 28th day of April, 2008.

A handwritten signature in black ink that reads "Willie Mae Shepherd". The signature is fluid and cursive.

Willie Mae Shepherd  
Supervisor, Membership Records  
The Florida Bar

WMS/KLM5/R10

AFFIDAVIT OF SERVICE

STATE OF NEW YORK     )  
  ) ss.:  
COUNTY OF NEW YORK    )

I, JENEIRA ACEVEDO, being sworn, says:

1.     I am over 18 years of age, am not a party to the action and my business address is 200 Park Avenue, New York, New York 10166.

2.     On the 28th day of May, 2008 I served the within NOTICE OF MOTION FOR THE PRO HAC VICE ADMISSION OF COUNSEL CARAN ROTHCHILD, AFFIDAVIT OF JERROLD F. GOLDBERG IN SUPPORT OF THAT MOTION AND PROPOSED ORDER FOR THE GRANTING OF THAT MOTION by depositing true copies thereof enclosed in post-paid wrappers, in an official depository under the exclusive care and custody of the United States Postal Service, addressed to the following:

Alan G. Kipnis, Esq.  
Arnstein & Lehr, LLP  
200 East Las Olas Boulevard, Suite 1700  
Ft. Lauderdale, FL 33301  
Attorneys for Plaintiff

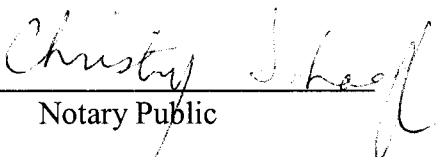
Martin Eisenberg, Esq.  
Thompson Hine LLP  
335 Madison Avenue, 12<sup>th</sup> Floor  
New York, New York 10017  
Attorneys for Plaintiff

Glenn Goldstein, Esq.  
Greenberg Traurig LLP  
401 East Las Olas Boulevard, Suite 2000  
Ft. Lauderdale, FL 33301

3.     I certify under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
Jeneira Acevedo

Sworn to before me this  
28<sup>th</sup> day of May, 2008

  
\_\_\_\_\_  
Notary Public

CHRISTY SCHAEFFER  
Notary Public, State of New York  
No. 31-4769958  
Qualified in New York County  
Commission Expires August 31, 2010

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
KEY CORPORATE CAPITAL, INC.,

Plaintiff,

-v.-

BNP PARIBAS S.A.,

Defendant.  
-----X

:  
: 08-CV-03695 (RJH)

: **ORDER FOR ADMISSION**  
: **PRO HAC VICE**  
: **ON WRITTEN MOTION**

Upon the motion of Jerrold F. Goldberg, attorney for Defendant, BNP Paribas, S.A. and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name: CARAN ROTHCHILD  
Firm Name: Greenberg Traurig, P.A.  
Address: 401 East Las Olas Boulevard  
Suite 2000  
City/State/Zip: Fort Lauderdale, FL 33301  
Phone Number: (954) 765-0500  
Fax Number: (954) 765-1477

is admitted to practice pro hac vice as counsel for Defendant BNP Paribas S.A., in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: May \_\_, 2008

City, State: New York, New York

\_\_\_\_\_  
RICHARD J. HOLWELL  
United States District Judge